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DIVISION OF CRIMINAL JUSTICE  
MEDICAID FRAUD CONTROL UNIT  
CIVIL ENFORCEMENT DIVISION

April 4, 2025

**MEMO ENDORSED**

The Honorable Valerie E. Caproni  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States, *et al. ex rel.* SCOIF v. Community Options, Inc., *et al.*,  
20 Civ. 4684 (VEC).

Dear Judge Caproni:

The Office of the New York State Attorney General represents the State of New York (the "State") in this matter, which has been settled and partially dismissed and unsealed as of March 26, 2025, following the execution of the Stipulation and Order Settlement and Dismissal between the State, Defendants, and Relator (ECF No. 21), and the Stipulation and Order of Settlement and Dismissal between the United States, Defendants, and Relator (ECF No. 19). We write on behalf of the State and the United States respectfully to request that the docketed versions of these Stipulations be replaced with versions containing limited redactions of protected health information contained in Exhibit A to both Stipulations, namely Medicaid beneficiary numbers, under the column labeled "Reference ID." *See* 45 C.F.R. § 164.514(b)(2)(i)(I) (requiring de-identification of protected health information including "[h]ealth plan beneficiary numbers"); *see also* *McCracken v. Verisma Sys., Inc.*, No. 14 Civ. 06248 (MAT), 2017 WL 4250054, at \*4 (W.D.N.Y. Sept. 26, 2017) (permitting exhibits containing protected health information to be filed under seal).

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Annexed hereto are redacted versions of both Stipulations. We thank the Court for consideration of this request.

Respectfully,



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Encls.

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Application GRANTED IN PART. The Stipulations and Orders of Settlement and Dismissal at Dkts. 19 and 21 shall remain under seal. The Clerk of Court is respectfully directed to unseal the Stipulation and Order of Settlement and Release at Dkt. 20.

By **Tuesday, April 8, 2025**, the State of New York must file a revised version of the proposed redactions to the Stipulation and Order of Settlement and Dismissal at Dkt. 21. It appears that the redactions proposed at Dkt. 28-2, p. 28, were inadvertently applied to entries in the Service Date column.

SO ORDERED.



4/7/2025

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE